UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MASSACHUSETTS

ENCOMPASS INSURANCE COMPANY OF MASSACHUSETTS,

CIVIL ACTION NO.:

Plaintiff,

VS.

JOSEPH D. GIAMPA, FREDERICK T. GIAMPA, ADVANCED SPINE CENTERS, INC. d/b/a FIRST SPINE REHAB, FUTURE MANAGEMENT CORPORATION, EDWARD KENNEDY, BRIAN J. CULLINEY, D.C. and JENNIFER McCONNELL, D.C.

Defendants.

5-11639 111

MOTION FOR APPOINTMENT OF SPECIAL PROCESS SERVER

The Plaintiff, Encompass Insurance Company of Massachusetts, pursuant to Fed. R. Civ. P. 4(c)(2), respectfully requests that this Court enter an Order appointing Quickserve, P.O. Box 7319, Quincy, Massachusetts, 02269, who are persons over the age of eighteen (18) and not a party to this action, and are qualified and knowledgeable in the Service of Process, as Special Process Servers authorized to serve all Process in this case.

Respectfully Submitted /

Encompass Insurance Company,

By its Attorneys.

Richard D. King, Jr.

BBO No.: 638142 Nathan A. Tilden

BBO No.: 647076

David O. Brink

BBO No.: 547370

SMITH & BRINK, P.C. 122 Quincy Shore Drive

Quincy, MA 02171

Tel: (617) 770-2214

Dated: August 10, 2005